

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-cr-108 (PAM/TNL)

UNITED STATES OF AMERICA,)
)
Plaintiff,)
vs.)
)
DEREK MICHAEL CHAUVIN,)
)
Defendant.)
)
)

**DEFENDANT’S PRETRIAL MOTION FOR
DISCOVERY AND INSPECTION OF
RECORDS OF ALL ELECTRICAL
SURVEILLANCE**

Derek Michael Chauvin, through his undersigned attorney, Eric J. Nelson, Halberg Criminal Defense, moves the Court for an Order directing the Government to disclose and allow for the inspection of all methods of electrical surveillance utilized by law enforcement in the above captioned case. This includes, but is not limited to:

1. Wire-tapping and the interception of telephone conversations;
2. Surveillance by radio transmissions or receptions;
3. GPS surveillance, “triggerfish” surveillance, or any other form of electrical surveillance used by law enforcement throughout the investigation of this case.

Furthermore, the defendant moves that the Court require the Government to disclose and allow for the inspection of any application, order, or log of the surveillance made by law enforcement or their agents. The defendant also requests that the Government be required to provide copies of any recordings obtained by law enforcement, any transcript thereof, and all returns of inventory of such surveillance.

This motion is based upon the files and records in this case, the Indictment, the Federal Statutes, the Federal Rules of Criminal Procedure, the United States and Minnesota Constitutions and upon such other and further points and authorities as may subsequently be presented to the Court.

Respectfully submitted,

HALBERG CRIMINAL DEFENSE

Dated: August 3, 2021

/s/ Eric J. Nelson

Eric J. Nelson

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